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1850 M Street NW, 11th Floor  
Washington, DC 20036

July 9, 1999

Magalie Salas  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

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JUL 9 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-170

Dear Ms. Salas:

Attached is the original, plus 4 copies, of Sprint Corp.'s Comments in the above-captioned proceeding. We have also provided David Konuch of the Common Carrier Bureau and ITS with this filing on diskette in WordPerfect 5.1 for Windows format.

Sincerely,

Norina Moy  
Director, Federal Regulatory  
Policy and Coordination

cc: David Konuch  
ITS

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Truth-in-Billing and Billing Format ) CC Docket No. 98-170

**COMMENTS**

Sprint Corporation hereby respectfully submits its comments on the Commission's Further Notice of Proposed Rulemaking in the above-captioned proceeding concerning standardized labels for charges relating to federal regulatory action. The Commission has tentatively concluded that the following labels are appropriate: "Long Distance Access" to identify charges related to IXCs' costs for access to the networks of local exchange carriers; "Federal Universal Service" to describe line items seeking to recover from customers carriers' universal service contributions; and "Number Portability" to describe charges relating to local number portability (FNPRM, para. 71).

As an initial matter, it is not clear that standardized labels are really necessary or that the benefits of implementing standardized labels are greater than the associated costs. Although IXCs call their PICC and USF-related charges by different labels, Sprint is unaware of any confusion associated with the nomenclature used by at least the largest IXCs. We would note that any change in nomenclature to existing rate elements will itself result in costs and customer confusion. For example, label changes might necessitate system changes by IXCs and LECs which bill on behalf of IXCs to accommodate the new labels; IXCs would have to re-educate their subscribers about the seeming new rate element; customer fulfillment, other customer communications, and carrier tariffs would have to be revised to reflect the new verbiage; and

customer service representatives would have to be re-trained as to the new labels so that they may respond appropriately to any customer inquiries. If smaller IXC's are using labels deemed confusing or misleading, the Commission could direct such carriers to revise their labels.

However, to the extent that the Commission continues to believe that standard labels are necessary, Sprint offers brief comments on the labels proposed in the NPRM. We do not object to use of "number portability" to describe LNP cost recovery charges. However, rather than "Long Distance Access" and "Federal Universal Service," Sprint recommends use of the labels "presubscribed line charge" and "carrier universal service charge." Sprint has used these labels for over a year now, and has received relatively few customer inquiries about either one of these rate elements.

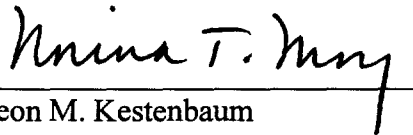
The label "long distance access" may be confusing to consumers who have heard about access charges generally, but do not know the difference between the per minute of use switched access rate elements, and the PICC. Because Sprint's presubscribed line charge is designed to recover only PICC expenses, we are concerned that calling this rate element "long distance access" will cause customers to question the validity of this charge when they may have heard that "access charges" (*i.e.*, the per MOU elements) have decreased. In contrast, Sprint believes that end users are generally familiar with the concept of presubscription of their long distance service, and our terminology makes it clear to customers that we are flowing through a per-line assessment on a flat (per-line or per account) basis.

Sprint also believes that our "carrier universal service charge" terminology is clear to end users. Although IXC's USF contributions are federal costs, adoption of the Commission's proposed label may imply that the rate element is a direct flow through of the universal service contribution factors calculated by the universal service fund administrator. In fact, an IXC's

USF-related rate element may recover both its direct contributions, and its share of LECs' USF contributions embedded in their interstate access charges paid by IXCs.

Respectfully submitted,

SPRINT CORPORATION

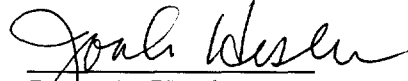
A handwritten signature in dark ink, appearing to read "Norina T. Moy", is written over a horizontal line.

Leon M. Kestenbaum  
Jay C. Keithley  
Norina T. Moy  
1850 M St., N.W., Suite 1110  
Washington, D.C. 20036  
(202) 857-1030

July 9, 1999

# **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document in was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 9<sup>th</sup> day of July, 1999 to the parties listed below.

  
Joan A. Hesler

Larry Strickling, Chief  
Common Carrier Bureau  
Federal Communications Comm.  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

International Transcription Svc.  
1231 20<sup>th</sup> Street, NW  
Washington, D.C. 20036

David Konuch  
Common Carrier Bureau  
Enforcement Division  
Federal Communications Comm.  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554